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May 10, 2023

Via ECF

Hon. Gabriel W. Gorenstein, U.S.M.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

MEMORANDUM ENDORSED

Re: 1:19-cv-10371-PAE-GWG Vasquez et al v. MobileShack Inc., et al.

Dear Judge Gorenstein:

As the Court is aware, this firm represents Defendants MobileShack Inc. ("MobileShack"), Avi Levy and Victor Levy (collectively, "Defendants") in the above-referenced action. We write to request that the deadline to submit the supplemental letter or brief, as the Court ordered on May 4, 2023 (ECF Dkt. No. 154) be briefly extended from May 11, 2023 to May 18, 2023. If granted, this extension of the deadline is intended to be reciprocal for Plaintiffs.

The primary reason is that I need to confer with my client on the facts to see if a supplemental declaration from them or additional factual information for inclusion in the supplemental letter is necessary. Despite diligent efforts, I have not been able to get in touch with my client since May 4 and it sounds from the dial tone that they may be abroad. Additionally, due to several depositions and court appearances this week, I need an additional week to fully analyze the *Helix* case cited in the Court's order.

We reached out to Plaintiffs' counsel and they consent to this request. This is the first request for an extension of this deadline.

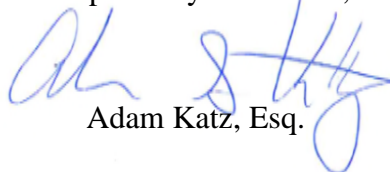
No other deadlines will be affected by this request.


We thank the Court for its attention to this request.

Extension to May 18, 2023, granted
as to all parties.

So Ordered.

Respectfully Submitted,


Adam Katz, Esq.


GABRIEL W. GORENSTEIN
United States Magistrate Judge
May 11, 2023

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